

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.1 Identify and describe all fiber meet point arrangements established by Verizon in Massachusetts.

- (a) With respect to each and every fiber meet point arrangement identified in response to this data request, identify the other party to the fiber meet point arrangement, i.e. local exchange carrier, interexchange carrier, or other entity.
- (b) With respect to each and every fiber meet point arrangement identified in response to this data request identify the physical location of the arrangement in Massachusetts by reference to street address, municipality, county or other general geographic reference.

REPLY: Verizon objects to this Information Request to the extent it seeks or Verizon's reply necessarily would reveal individual carrier proprietary information.

Notwithstanding its objection, Verizon states that it has a total of eight fiber meet point arrangements established in Massachusetts with a total of four local exchange carriers.

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Respondent: Willett Richter
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REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.4 Identify and describe all fiber meet point arrangements established between Verizon and Charter in Massachusetts.

REPLY: Verizon objects to this Information Request on the grounds that the requested information would be in Charter's possession.

Notwithstanding this objection, Verizon states that no fiber meet arrangements have been established between Verizon and Charter in Massachusetts.

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Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.5 Identify and describe all fiber meet point arrangements established between Verizon and Charter in any state other than Massachusetts.

REPLY: Verizon objects to this Information Request on the grounds that information on fiber meet arrangements in any state other than Massachusetts is beyond the jurisdiction of the Department and is not relevant to this proceeding. Verizon also objects on the grounds that the requested information is already in Charter's possession.

Notwithstanding the foregoing objections, Verizon states that it has one fiber meet arrangement with Charter outside of Massachusetts and that fiber meet arrangement is located in Wausau, Wisconsin.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.7 Identify and describe all circumstances where Verizon exchanges the following types of traffic with other local exchange carriers (competitive or incumbent), interexchange carriers ("IXC") or other entities, via a fiber meet point arrangement:

- (a) operator services/directory assistance traffic;
- (b) interLATA toll traffic;
- (c) 911 traffic.

REPLY: Verizon objects to this Information Request on the grounds that information on fiber meet arrangements in any state other than Massachusetts is beyond the jurisdiction of the Department and is not relevant to this proceeding.

Notwithstanding its objection, Verizon replies as follows.

- (a) Verizon does not exchange operator services/directory assistance traffic between Verizon's customers and customers of other carriers via a mid-span (or other) fiber meet arrangement. Where Verizon has a mid-span (or other) fiber meet arrangement, it allows or will allow the other carrier to use some of the facilities on the fiber meet arrangement to deliver operator services/directory assistance traffic from the other carrier's customers to an operator services/directory assistance provider, subject to Verizon's applicable tariff rates.

ITEM: Charter 1.7

REPLY: Cont'd

- (b) Verizon does not exchange interLATA toll traffic between Verizon's customers and customers of other carriers via a mid-span (or other) fiber meet arrangement. Where Verizon has a fiber meet arrangement, it allows or will allow the other carrier to use some of the facilities on the fiber meet arrangement to deliver interLATA toll traffic from the other carrier's customers to an interexchange carrier, subject to Verizon's applicable tariff rates.
- (c) Verizon does not exchange 911 traffic between Verizon's customers and customers of other carriers via a mid-span (or other) fiber meet arrangement. Where Verizon has a fiber meet arrangement, it allows or will allow the other carrier to use some of the facilities on the fiber meet arrangement to deliver 911 traffic from the other carrier's customers to Public Safety Answering Points, subject to Verizon's applicable tariff rates.

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D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.8 State whether Verizon has ever established a fiber meet point arrangement with another local exchange carrier (incumbent LEC or competitive LEC), IXC or other entity before that point in time where the traffic volume between Verizon and the other entity had reached a DS3's worth of traffic volume.

REPLY: Verizon objects to this Information Request on the grounds that information on fiber meet arrangements in any state other than Massachusetts is beyond the jurisdiction of the Department and is not relevant to this proceeding.

Notwithstanding its objection, Verizon states that the requested information is not readily available. Verizon does not track or retain the requested information in any system or database that would enable the company to provide a responsive reply.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.9 To the extent that Verizon's response to data request 1.8 is anything other than an unequivocal "none", identify all instances in which such fiber meet point arrangement was established. Include in that response the name of the other entity, the date the fiber meet point arrangement was established and the general geographic location of the fiber meet point arrangement.

REPLY: Please see Verizon's reply to Charter 1.8.

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D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.10 Identify and describe all fiber meet point arrangements established by Verizon with another local exchange carrier (incumbent LEC or competitive LEC), IXC or other entity which Verizon contends are currently underutilized, or do not represent an efficient use of network resources.

REPLY: Verizon objects to this Information Request on the grounds that information on fiber meet arrangements in any state other than Massachusetts is beyond the jurisdiction of the Department and is not relevant to this proceeding. Verizon also objects to this Information Request to the extent it seeks individual carrier proprietary information.

Notwithstanding its objections, Verizon contends that its existing fiber meet point arrangement with Charter in Wausau, Wisconsin, is underutilized and does not represent an efficient use of network resources. Verizon and Charter agreed to build an OC 12 fiber meet point arrangement in Wausau, WI. Charter has not achieved traffic volumes that would represent an efficient use of network resources for an OC 12 system.

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D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.11 Identify and describe all fiber meet point arrangements established by Verizon with Charter that Verizon contends are currently underutilized or do not represent an efficient use of network resources.

REPLY: Verizon objects to this Information Request on the grounds that information on fiber meet arrangements in any state other than Massachusetts is beyond the jurisdiction of the Department and is not relevant to this proceeding.

Notwithstanding its objection, Verizon states that the fiber meet point arrangement Verizon established with Charter in Wisconsin more than four years ago is underutilized because the amount of traffic carried over that fiber meet arrangement is less than one-third of the capacity of that system. Indeed the fiber meet point arrangement established in Wisconsin in 2002 actually illustrates the major concerns Verizon has raised here in Massachusetts. The cost of deploying a mid-span fiber meet arrangement can be substantial and such costs cannot be justified from an investment or network efficiency perspective when traffic volumes aren't sufficient.

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D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.12 Identify and describe all OC3 fiber optic systems that Verizon has deployed in Massachusetts, or any other state, which currently carry traffic volumes below a DS3 level.

REPLY: Verizon objects to this Information Request to the extent it requests information outside of Massachusetts on the grounds that such information is not relevant to this proceeding and is beyond the jurisdiction of the Department. Verizon also objects to this Information Request to the extent it requests information from Verizon entities other than Verizon New England Inc. (d/b/a Verizon Massachusetts) on the grounds that such entities are not parties to this proceeding. Verizon further objects on the grounds that information responsive to this request is not readily available and would require a burdensome special study.

Without waiving its objections and in an effort to be responsive, Verizon states that many OC3 fiber optic systems that Verizon has deployed in Massachusetts are used to provide point-to-point special access services to customers and it is not possible for Verizon to measure traffic on those systems. In addition, for those OC3 fiber optic systems that Verizon has deployed in Massachusetts to carry Verizon traffic, Verizon states that it does not routinely measure traffic over its fiber transport systems nor does it maintain usage studies of those systems in a centralized database that would enable Verizon to provide a responsive reply.

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d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

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Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.13 Identify and describe all OC3 fiber optic systems that Verizon has deployed in Massachusetts, or any other state, which have at any time in the past carried traffic volumes below a DS3 level.

REPLY: Verizon objects to this Information Request to the extent it requests information outside of Massachusetts on the grounds that such information is not relevant to this proceeding and is beyond the jurisdiction of the Department. Verizon also objects to this Information Request to the extent it requests information from Verizon entities other than Verizon Massachusetts, Inc., on the grounds that such entities are not within the jurisdiction of the Department.

Without waiving its objections and in an effort to be responsive Verizon states that it does not routinely measure traffic over its fiber transport systems nor does it maintain usage studies of those systems in a centralized database that would enable Verizon to provide a responsive reply.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.14 Identify and describe those locations in LATAs 126 and 128 where Verizon has deployed any of the following network facilities or equipment in conjunction with a fiber meet arrangement:

- (a) fiber optic lines or facilities;
- (b) fiber optic terminals, including any optical OC3 cards;
- (c) fiber network interface devices (or FNIDs);
- (d) add / drop multiplexing devices.

REPLY: Verizon objects to this Information Request to the extent it seeks or Verizon's reply necessarily would reveal individual carrier proprietary information. Verizon further objects to this Information Request on the grounds that information responsive to this request is not readily available and would require a burdensome special study.

Notwithstanding its objection, Verizon states that it is likely that all eight arrangements established in Massachusetts would involve (a) fiber optic lines or facilities, (b) fiber optic terminals, including optical OC3 (or OC 12) cards, and (d) add/drop multiplexers. Some also would have (c) fiber network interface devices (FNIDs) deployed.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.15 Identify and describe all instances where Verizon has deployed an OC3 system, or individual fiber optic facilities (including fiber optic terminals, OCx cards, fiber NIDs, add / drop multiplexing equipment), in one location and later re-deployed, moved or re-located such facilities for use in a second location.

REPLY: Verizon objects to this Information Request to the extent it requests information outside of Massachusetts on the grounds that such information is not relevant to this proceeding and is beyond the jurisdiction of the Department. Verizon also objects to this Information Request to the extent it requests information from Verizon entities other than Verizon Massachusetts, Inc., on the grounds that such entities are not parties to this proceeding. Verizon further objects to this request to the extent it seeks information on all OC3 fiber systems Verizon has deployed for itself on the grounds that such information is not relevant to this proceeding (i.e., to mid-span fiber meet point arrangements between Verizon and another carrier) and therefore not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving its objections, Verizon states that the requested information is not tracked in any centralized system or database (or other format) that would enable Verizon to provide a responsive reply.

**Verizon New England Inc.
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Commonwealth of Massachusetts

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**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.16 Identify and describe all instances where Verizon has initiated or implemented marketing or other similar campaigns in Massachusetts in the last five years in order to retain or “win-back” telephone subscribers.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.17 Identify those communities in Massachusetts where Verizon's FiOS service is currently available. Also identify all communities in Massachusetts where Verizon intends to introduce its FiOS service within the next thirty six months.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and highly competitively sensitive marketing plans and information.

Without waiving these objections, Verizon states that information on where Verizon's FIOS service is currently available may be found at Verizon's website at: <http://www22.verizon.com/>.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.21 Identify and describe any discounts, price reductions, preferred payment arrangements or other arrangements that Verizon received or obtains from the vendor(s) or equipment maker(s) from whom Verizon purchases equipment identified in Verizon's response to data request 1.18.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and competitively sensitive information.

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D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.23 Identify and describe Verizon's costs of interconnecting with Charter via other technically feasible methods of interconnection, including:

- (a) leased facilities;
- (b) collocation arrangements.

REPLY: Verizon objects to this Information Request on the grounds that the request is overly vague and ambiguous. For example, Verizon cannot determine the cost of interconnecting through collocation without knowing more specific information about the arrangement, such as the location of the collocation arrangement, the size of the collocation arrangement, the type of collocation (*e.g.*, physical, virtual), and the quantity and type of cross connects.

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Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.24 Identify and describe all geographic locations that Verizon has deployed fiber optics, or fiber facilities, in LATAs 126 and 128.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and highly competitively sensitive marketing plans and information. Finally, Verizon objects on the grounds that information responsive to this request is not readily available and would require an overly burdensome special study.

**Verizon New England Inc.
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D.T.E. Docket No. 06-56

**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.25 Identify and describe any situation where Verizon has deployed fiber optics, or fiber facilities, to a length greater than five hundred feet from any central office to which the fiber is connected. Include in this response a statement of the additional incremental costs, beyond the cost of deploying the fiber the initial fiber hundred feet, to Verizon of deploying such facilities.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and highly competitively sensitive marketing plans and information. Finally, Verizon objects on the grounds that information responsive to this request is not readily available and would require an overly burdensome special study.

**Verizon New England Inc.
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**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.26 Identify and describe any situation where Verizon has deployed fiber optics, or fiber facilities, to length greater than three miles from any central office to which fiber is connected. Include in this response a statement of the additional incremental costs, beyond the cost of deploying the fiber for the first three miles, to Verizon of deploying such facilities.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and highly competitively sensitive marketing plans and information. Finally, Verizon objects on the grounds that information responsive to this request is not readily available and would require an overly burdensome special study.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.27 Identify and describe the specific fiber optic facilities used to provide Verizon's FiOS services in Massachusetts.

REPLY: Verizon objects to this Information Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects on the grounds that the request seeks proprietary, confidential and highly competitively sensitive network plans and information.

**Verizon New England Inc.
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D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.28 State whether Verizon, or its parent company, or another Verizon entity within the corporate family, currently has in its possession any of the following equipment which has not yet been deployed:

- (a) add / drop multiplexers;
- (b) OC3 cards
- (c) LGX fiber panels;
- (d) Fiber network interface devices;
- (e) Fiber optic cable.

REPLY: Verizon objects to this Information Request to the extent it requests information outside of Massachusetts on the grounds that such information is not relevant to this proceeding and is beyond the jurisdiction of the Department. Verizon also objects to this Information Request to the extent it requests information from Verizon entities other than Verizon Massachusetts, Inc., on the grounds that such entities are not parties to this proceeding. Verizon further objects to this request to the extent it seeks information on fiber systems Verizon has in its possession on the grounds that such information is not relevant to this proceeding (i.e., to mid-span fiber meet point arrangements between Verizon and another carrier) and therefore not reasonably calculated to lead to the discovery of admissible evidence. Finally, Verizon objects on the grounds that information responsive to this request is not readily available and would require a burdensome special study.

ITEM: Charter 1.28

REPLY: Cont'd

Without waiving its objections and in an effort to be responsive Verizon states that such equipment typically is ordered on a per-job basis and at any point in time Verizon undoubtedly would have some or all of the listed equipment in its possession in a staging warehouse pending installation.

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Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.29 Describe the method Verizon uses to measure traffic over existing fiber meet point arrangements or OC3 systems that it has deployed. Include in this response the frequency that Verizon measures such traffic (i.e. daily, weekly, monthly).

REPLY: Verizon does not routinely measure traffic over its fiber transport systems nor does it maintain usage studies in a centralized system or database that would permit Verizon to provide a responsive reply. Verizon notes, however, that to the extent that facilities in a fiber meet point arrangement are connected to a Verizon switch and used to exchange local or intraLATA toll traffic between Verizon's customers and another local exchange carrier's customers, such traffic that terminates to Verizon's customers is measured in Verizon's switches.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

**Respondent:
Title:**

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.30 Identify the amount of Verizon's stranded investment in Massachusetts. The term "stranded investment", as used here, shall have the same meaning as that term is used on page 7, lines 11 and 12, of the Testimony of Willett Richter on behalf of Verizon New England, Inc., d/b/a Verizon Massachusetts, as filed in D.T.E. Docket 06-56 on August 2, 2006.

REPLY: Verizon objects to this Information Request to the extent it requests information from Verizon entities other than Verizon Massachusetts, Inc., on the grounds that such entities are not within the jurisdiction of the Department. Verizon further objects to this request to the extent it seeks information that is not relevant to this proceeding (i.e., to mid-span fiber meet point arrangements between Verizon and another carrier) and therefore not reasonably calculated to lead to the discovery of admissible evidence. Finally, Verizon objects on the grounds that information responsive to this request is not readily available and would require a burdensome special study.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.31 Identify and describe the service platforms that Verizon makes available to competitive LECs in Massachusetts. The term “service platform”, as used here, shall have the same meaning as that term is used on page 10, line 25, of the Testimony of Willett Richter on behalf of Verizon New England, Inc., d/b/a Verizon Massachusetts, as filed in D.T.E. Docket 06-56 on August 2, 2006.

REPLY: E911 tandems and selective routers
Operator Services
Directory Assistance